

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

BLUEBECK HOLDINGS LTD., )  
                               )  
Plaintiff,                 ) CASE NO: 3:23-cv-02095-MEM  
                               )  
v.                             ) JUDGE KAROLINE MEHALCHICK  
                               )  
SWN PRODUCTION COMPANY, )  
LLC, *et al.*,             )  
                               )  
Defendants.                 )

**DECLARATION OF BETHANY WILSON**

Pursuant to 28 U.S.C. §1746, Bethany Wilson declare as follows:

1. My full name is Bethany Wilson, and I am an adult individual and resident of Harris County, Texas.
2. I am over eighteen years of age, under no mental or legal disability, and competent to testify as to the matters set forth herein.
3. I am employed as “Senior Accounting Manager – Revenue” by Southwestern Energy Company (“Southwestern”), which has been named as one of the several corporate-entity defendants in the above-captioned action.
4. Southwestern’s principal place of business is located at 10000 Energy Drive, Spring, Harris County, Texas 77389.
5. As part of my employment, I provide certain support to Southwestern’s wholly-owned subsidiary, SWN Production Company, LLC (“SWN Production”),

which has offices both at 10000 Energy Drive, Spring, Harris County, Texas 77389, and at 917 SR 92 N, Tunkhannock, Wyoming County, Pennsylvania 18657-5647.

6. Specifically, I and those on my team at Southwestern book the revenue and pay the respective royalty owners, states, federal agencies, and severance taxes related to the oil and gas wells for which SWN Production is identified as the operator.

7. With respect to the allegations set forth in the Complaint filed in the above captioned action, all the royalty payments made by SWN Production to Plaintiff or its predecessor-in-interest were printed and mailed for SWN Production by a third-party service located in Tulsa, Oklahoma. SWN Production never used a third-party service located in the Commonwealth of Pennsylvania to print and mail the royalty payments that were issued to Plaintiffs.

8. Further, all the royalty payments made by SWN Production were delivered to Plaintiff or its predecessor-in-interest at their address in East Norwich, New York. No royalty payment at issue in this case was ever delivered to Plaintiff or its predecessor-in-interest at any address in the Commonwealth of Pennsylvania.

9. Additionally, all royalty payments to Plaintiff or its predecessor-in-interest were drawn from a bank account located in SWN Production's name in Houston, Texas. No royalty payment at issue in this case was ever drawn from a back account opened or maintained in Commonwealth of Pennsylvania.

10. Moreover, all monthly statements of oil and gas payments, including without limitation the statement marked as Exhibit "N" to the Complaint, were printed and mailed for SWN Production by third-party services that were, to the best of my knowledge, located in Austin, Texas, or Fayetteville, Arkansas. SWN Production never used a third-party service located in the Commonwealth of Pennsylvania to print and mail the monthly statements of oil and gas payments that were issued to Plaintiffs.

11. Finally, all monthly statements of oil and gas payments, including without limitation the statement marked as Exhibit "N" to the Complaint, were delivered to Plaintiff or its predecessor-in-interest at their address in East Norwich, New York. No monthly statement at issue in this case was ever delivered to Plaintiff or its predecessor-in-interest at any address in the Commonwealth of Pennsylvania.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct, and that this declaration was executed on this 29<sup>th</sup> day of February, 2024.



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Bethany Wilson